



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DG/NJM  
F. #2018R02161

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 4, 2022

**BY EMAIL**

Clerk of the Court  
(for forwarding to randomly assigned United States District Judge)  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**\*\*FILED\*\***

4:22 pm, May 04, 2022

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

The Honorable Kiyo A. Matsumoto  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**1:22-cr-00209(FB)(TAM)**

Re: United States v. Lee Cohen

Dear Clerk of Court and Judge Matsumoto:

Pursuant to Local Rule 50.3.2, the government hereby notifies the Court that the above-captioned case ("Cohen") is presumptively related to United States v. Dennis Mancino, et al., No. 18-CR-296 (KAM) ("Mancino").

Local Rule 50.3.2(b)(1) provides for a "presumption that one case is 'related' to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case." Local Rule 50.3.2(c)(1) directs the United States Attorney's Office to "give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1)."


This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). The Cohen case is presumptively related to the Mancino case because the facts of Cohen arise out of the same criminal scheme as charged in Mancino. Specifically, the Mancino indictment charged defendant Dennis Mancino with conspiracy to commit securities fraud and securities fraud in connection with a scheme to manipulate the price and trading volume of HDVW 360, Inc. ("HDVW"), a publicly traded company. (Dkt. No. 27 (Mancino Indictment)). Under the same

docket number, Mancino's co-defendant William Hirschy was charged by information with the same two counts (Dkt. No. 25 (Hirschy Information)). Mancino and Hirschy have both pled guilty and Mancino has been sentenced. (See Dkt. Nos. 6, 47, 97). Cohen is presumptively related to Mancino because Count Two of the Cohen information charges the same conduct charged in Mancino and to which Mancino and Hirschy both pled guilty – specifically, a conspiracy to manipulate the price and trading volume of HDVW. As the case is thus presumptively related, the government respectfully submits that reassignment would be appropriate, as it would likely result in a significant savings of judicial resources and serve the interests of justice.

Respectfully submitted,

BREON PEACE  
United States Attorney

By:

  
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